

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

----- X
ALYSA OCASIO, ANDREW OCASIO, and
JAHAIIRA HOLDER, as Administratrix of the Estate
of Sandy Guardiola,

Plaintiffs,

- against -

The CITY OF CANANDAIGUA, a municipal entity;
Canandaigua Police Chief STEPHEN HEDWORTH,
in his individual and official capacities; Canandaigua
Police Sergeant SCOTT KADIEN, in his individual
capacity; DOCCS Regional Director GRANT
SCRIVEN, in his individual capacity; DOCCS Parole
Chief DAWN ANDERSON, in her individual
capacity; DOCCS Senior Parole Officer THOMAS
O'CONNOR, in his individual capacity; DOCCS
Senior Parole Officer BETH HART-BADER, in her
individual capacity,

Defendants.
----- X

No. 18-cv-06712 (MAV)(MWP)

NOTICE OF PLAINTIFFS' MOTION FOR SANCTIONS

Motion By:

Alysa Ocasio, Andrew Ocasio, and Jahaira
Holder, as Administratrix of the Estate of
Sandy Guardiola

Time and Place of Hearing:

ORAL ARGUMENT REQUESTED:

January 15, 2025, at 2:00 p.m. before the
Honorable Colleen Holland,
United States District Court for Western
District of New York, located at the United
States Courthouse, 100 State Street, Rochester,
New York 14614.

Relief Demanded:

Sanctions, attorneys' fees, and for other relief
under Fed. R. Civ. P. 26 and 37

Supporting Papers:

Memorandum of Law dated December 31,
2024; Affirmation of Marc Cannan in Support
of Motion dated December 31, 2024, and
accompanying exhibits. Plaintiffs intend to file
a Reply Memorandum of Law.

Opposition Papers:

Opposing papers must be served not less than 14 calendar days after service of the motion pursuant to Rule 7.1(b)(2) of the Local Rules for the United States District Court for Western District of New York.

Dated: New York, New York
December 31, 2024

Respectfully submitted,
BELDOCK LEVINE & HOFFMAN LLP

By: /s/Marc A. Cannan
Jonathan C. Moore
Luna Droubi
Marc A. Cannan
Marc Arena
M. Olivia Clark

Attorneys for Plaintiffs